

plaintiffs' Complaint, defendant responds as follows:

1.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

2.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

3.

Defendant admits the allegations contained within this paragraph of plaintiff's Complaint.

4.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

5.

Defendant admits the allegations contained within this paragraph of plaintiff's Complaint.

6.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

7.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

8.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

9.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

10.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

11.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

12.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

13.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

14.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

15.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

16.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

17.

Defendant denies the allegations contained within this paragraph of plaintiff's Complaint.

18.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

Any allegation, language or paragraph of plaintiffs' Complaint not heretofore responded to is specifically denied by defendant Shilan Parham.

WHEREFORE, having fully answered plaintiffs' Complaint, defendant prays:

- a) that plaintiffs' Complaint be dismissed;

- b) that defendant have judgment in her favor;
- c) that defendant have a trial by jury of twelve persons; and
- d) that defendant have all other proper relief.

This 29th day of July, 2020.

/s/ Matthew Hurst
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Georgia Bar No. 480267
Attorneys for Defendant
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CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing document complies with the font and point selections approved by the Court in Local Rule 5.1C. The foregoing document has been prepared in Times New Roman font, 14 point.

/s/ Matthew Hurst
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This 29th day of July, 2020.

/s/ Matthew Hurst
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